

JCB MODERN SLAVERY STATEMENT FOR 2018

This statement is published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by JCB Service and other relevant JCB group companies (JCB) during the year ended 31st December 2018.

INTRODUCTION

Slavery, servitude, forced labour and human trafficking (Modern Slavery) is prevalent across the world today. It is important that businesses do not deny or try to ignore this problem. JCB has a zero tolerance approach to Modern Slavery within our operations and supply chain and we are committed to ensuring that this approach is effective.

JCB's BUSINESS

JCB is a family-owned manufacturer of earthmoving, excavating and materials handling equipment and generators primarily for the construction and agricultural industries. JCB has a range of more than 300 products.

JCB EMPLOYEE POLICIES

JCB's Employee Handbook (of which there are local variants used across JCB's subsidiary businesses around the world) communicates JCB's values and expectations of our employees.

JCB undertakes "right to work" checks on all direct employees prior to them commencing their roles with us. This includes checking, where applicable, that the employee has a valid work visa and is of an appropriate age to work.

We also operate a Whistleblowing Policy aimed principally at our UK employees but also available to all our employees which encourages individuals to report wrong doing which extends to human rights violations like Modern Slavery.

JCB's SUPPLY CHAIN

The supply chain involved in the manufacture of JCB's products is complex, involving multiple levels between JCB and the source of raw materials that enter the manufacturing process. While this makes it a challenge to effectively manage the risks of Modern Slavery throughout the entire supply chain, the approach we take is to actively manage and use our Tier 1 (direct) suppliers as the means by which JCB clearly communicates our expectations down through the supply chain.

JCB has a substantial number of suppliers (both production and non-production) supporting its worldwide business operations. JCB operates a global sourcing strategy for components and raw materials, however the majority of JCB's suppliers are based in the United Kingdom and Europe with a growing number based in India and China.

SUPPLIER ADHERENCE TO JCB VALUES & ETHICS

The appointment of JCB suppliers is undertaken either at JCB Group or local level as appropriate. Before any JCB supplier is appointed, a comprehensive review is undertaken of their commercial, financial and reputational standing.

SUPPLIER CODE OF CONDUCT

JCB's Supplier Code of Conduct communicates our social standards and business ethics to our supply chain. This includes specific requirements which are directly relevant to ensuring Modern Slavery is not taking place within the supplier's business.

Acceptance of our Supplier Code of Conduct is a mandatory requirement of doing business with JCB. All new and existing suppliers are required to sign this important document.



CONTRACTUAL CONTROLS

JCB's standard Terms and Conditions of Purchase include dedicated Modern Slavery & Labour Law compliance clauses, which contractually oblige our suppliers to ensure Modern Slavery is not occurring in their business. These clauses also oblige them to implement due diligence procedures for their own suppliers to ensure that no Modern Slavery is taking place further down the supply chain.

JCB's DUE DILIGENCE PROCESSES FOR MODERN SLAVERY

We evaluate our suppliers across quality, cost and risk metrics. This evaluation forms the basis of any future business award.

Key metrics included in this evaluation that provide confirmation of our due diligence processes are:

a) JCB Supplier Audit

All production suppliers are subjected to a new supplier audit. This requires a visit to the supplier premises by a representative from JCB.

b) Completion of an Independent Third Party Supply Chain Risk Management Assessment

JCB uses a leading global supply chain risk management company who collects, validates and maintains essential supplier data on behalf of JCB through an online questionnaire. JCB joined this Automotive Community supply chain management platform and request our production suppliers to complete the standardised self-assessment questionnaire which includes questions relevant to Modern Slavery.

c) Time since last visit by a JCB employee

Meeting face to face with our suppliers and establishing a clear communication channel is fundamental to successfully managing our relationship with that supplier. These meetings increase the likelihood of detection of unacceptable business practices in the supplier's operations. Therefore the time since the last "in person" meeting with the supplier is a key risk metric; the longer it has been since the last visit, the higher the risk becomes with that supplier.

We operate a global Supplier Management System to manage how we request, store and report supplier information and documentation. Key supplier performance indicators are visually reported on the Executive Supplier Dashboard and performance reviewed by the Senior Management Team at the monthly "Supplier Risk" meeting.

FURTHER STEPS

JCB continues to work with our suppliers to increase supply chain transparency and more specifically in relation to ensuring Modern Slavery is not taking place within its supply chain.

To raise JCB staff awareness of this important issue a Modern Slavery briefing sheet will be issued to all employees highlighting some common signs of Modern Slavery as well as how to report any concerns.



Statement Signed by JCB Chief Executive Officer Graeme Macdonald

